

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

OCT 27 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 99-271
Table of Allotments) RM-9696
FM Broadcast Stations)
(Boulder City, Nevada, Bullhead)
City, Arizona, Lake Havasu City,)
Arizona, Kingman, Arizona,)
Ludlow, California, Mohave Valley,)
Arizona, and Dolan Springs, Arizona))

DOCKET FILE COPY ORIGINAL

TO: John A. Karousos, Chief
Allocations Branch, Policy and Rules Division
Mass Media Bureau

REPLY COMMENTS OF CENTENNIAL BROADCASTING LICENSE, LLC

Centennial Broadcasting License, LLC ("Centennial"), the proponent of the above-captioned rule making proceeding, hereby submits its comments in reply to (a) the "Comments on Notice of Proposed Rulemaking and Opposition to Order to Show Cause" ("Comments") filed by Tele-Media Company of Southern California, L.L.C. ("Tele-Media") and (b) the "Counterproposal" filed by Mag Mile Media, L.L.C. ("Mag Mile"). As set forth below, Tele-Media's Comments fail to raise any valid objection to the channel allotments proposed in the Notice of Proposed Rule Making ("NPRM") herein. Further, the variations which Mag Mile proposes in its Counterproposal may, with minor changes, be accomplished in a manner which is generally consistent with Centennial's allotment proposal and complies with Commission requirements.

No. of Copies rec'd OK 4
List ABCDE

Tele-Media is the licensee of Station KDUQ(FM), and the channel on which it is authorized to broadcast would be modified pursuant to Centennial's original proposal and the NPRM. In its Comments, Tele-Media acknowledges that Centennial's proposed allotments comply with the Commission's mileage requirements. Tele-Media Comments at 2-3. Nonetheless, Tele-Media asserts that, with implementation of Centennial's proposal, "real world interference" would occur to Station KDUQ(FM), largely along highways outside the station's 60 dBu contour. Tele-Media, however, cites no authority in support of its suggestion that it should be entitled to some level of protection significantly greater than is provided by the Commission's rules (i.e., beyond its 60 dBu contour). Moreover, Tele-Media wants protection from non-cognizable interference (what Tele-Media terms "real world interference" because, presumably, it is not "interference" recognized by the Commission's rules) so that Tele-Media would be allowed to serve an unidentified and unidentifiable audience of potential highway drivers. Clearly, Tele-Media has no legitimate basis on which to oppose the proposed channel allotments, and its Comments can and should be disregarded.

Mag Mile is the licensee of Station KFLG(FM), Bullhead City, Arizona. In its Counterproposal Mag Mile suggests that (a) Channel 274C -- the Bullhead City channel on which it currently operates -- be moved to Dolan Springs, Arizona, and (b) Channel 272A be allotted to Mohave Valley, Arizona. In each case, the counterproposed allotment would be the community's first local service. As shown below and in the engineering statement attached as Exhibit A, Mag Mile's interest in establishing first local service in Mohave Valley and Dolan Springs can be accommodated while still preserving important elements of the allotments originally proposed by Centennial.

First, with respect to a Mohave Valley allotment, Channel 240A is available (rather than Mag Mile's counterproposed Channel 272A) and can be allotted to Mohave Valley without altering any aspect of Centennial's original proposal. See Exhibit A. Second, with respect to Dolan Springs, Mag Mile's counterproposal, with only minor changes, can be easily accommodated consistent with Centennial's original proposal. Mag Mile's station KFLG(FM) currently operates on Channel 274C, and Mag Mile's Counterproposal simply suggests a move of that channel to Dolan Springs. Centennial's original proposal would have modified Mag Mile's allotment to Channel 289C but would have left its community of license as Bullhead City. As set forth in Exhibit A, the originally proposed Channel 289C, Centennial's preferred channel, can be allotted to Dolan Springs, Mag Mile's preferred community of license. Exhibit A. Equally important, Mag Mile has consented to this modification of its counterproposal, see Exhibit B, and Centennial understands that Mag Mile will be separately filing a statement to that effect. Thus, both communities proposed by Mag Mile for first local service can be allotted channels with only minor modifications to the allotments proposed in the NPRM and in a manner acceptable to both Centennial and Mag Mile.

Accordingly, Centennial proposes the following modest variation on the allotment plan proposed in the NPRM:

<u>Station</u>	<u>City of License</u>	<u>Existing Allotment</u>	<u>NPRM Proposal</u>	<u>Modified Proposal</u>
KSTJ	Boulder City, NV	288C2	274C	274C
KFLG	Bullhead City, AZ	274C	289C	--
KFLG	Dolan Springs, AZ	--	--	289C
KJJJ	Lake Havasu City, AZ	224C2	272C2	272C2

<u>Station</u>	<u>City of License</u>	<u>Existing Allotment</u>	<u>NPRM Proposal</u>	<u>Modified Proposal</u>
KRCY	Kingman, AZ	290C1	224C1	224C1
KDUQ	Ludlow, CA	289A	273A	273A
KZUL	Lake Havasu City, AZ	283C2	283C2	283C2 ^{1/} (no change from existing allotment)
NEW	Mohave Valley	--	--	240A

The Commission has specifically held that,

after the counterproposal deadline, . . . it is appropriate for a party to the proceeding to suggest alternate channels which may lead to a resolution with respect to the communities already at issue in the proceeding.

Pinewood, South Carolina, 5 FCC Rcd 7609, 7610 (1990). That is precisely what Centennial is doing here. Centennial, the original proponent in this proceeding, is suggesting an alternate channel arrangement with respect to the communities already at issue herein. Importantly, the proposal as modified accommodates the interests of both Centennial (the original proponent) and Mag Mile, and thus affords public interest benefits which are considerably greater than those underlying the more limited counterproposal of Mag Mile.

WHEREFORE, for the reasons stated, Centennial Broadcasting License, LLC, proposes that the FM Table of Allotments be amended as set forth in the “Modified Proposal” column below and urges the Commission to act promptly to make these changes:

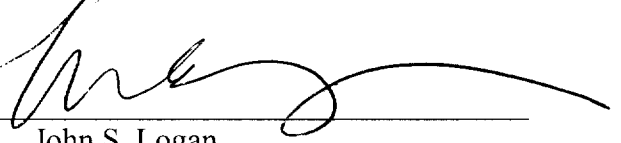
^{1/} As set forth in Centennial’s original petition for rule making, Channel 283C2 is presently allotted to Lake Havasu City, Arizona, although there is pending a proposal to substitute Channel 286C2 for Channel 283C2. Centennial’s original petition proposed leaving Channel 283C2 in Lake Havasu City; the NPRM endorsed that proposal. As modified herein, however, Centennial’s proposal would accommodate either Channel 283C2 or Channel 286C2 in a manner consistent with all applicable rules.

<u>City of License</u>	<u>Existing Allotment</u>	<u>NPRM Proposal</u>	<u>Modified Proposal</u>
Boulder City, NV	288C2	274C	274C (no change from NPRM proposal)
Bullhead City, AZ	274C	289C	--
Dolan Springs, AZ	--	--	289C
Lake Havasu City, AZ	224C2	272C2	272C2 (no change from NPRM proposal)
Kingman, AZ	290C1	224C1	224C1 (no change from NPRM proposal)
Ludlow, CA	289A	273A	273A (no change from NPRM proposal)
Lake Havasu City, AZ	283C2	283C2 2	Either 286C2 (no change from existing allotment) or 283C2
Mohave Valley, AZ	--	--	240A

Respectfully submitted,

CENTENNIAL BROADCASTING
LICENSE, LLC

By


John S. Logan

M. Anne Swanson

of

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Its Attorneys

October 27, 1999

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

Exhibit A

ENGINEERING EXHIBIT EE-2:

**MM DOCKET 99-271 - REPLY COMMENTS BY
CENTENNIAL BROADCASTING LICENSE LLC**

FM TABLE OF ALLOTMENTS

FM CHANNEL 274C FOR 288C2 - BOULDER CITY, NV
FM CHANNEL 274C (DELETION) - BULLHEAD CITY, AZ
FM CHANNEL 289C (MOVE) - DOLAN SPRINGS, AZ
FM CHANNEL 272C2 FOR 224C2 - LAKE HAVASU CITY, AZ
FM CHANNEL 224C1 FOR 290C1 - KINGMAN, AZ
FM CHANNEL 273A FOR 289A - LUDLOW, CA
FM CHANNEL 240A (ADD) - MOHAVE VALLEY, AZ

OCTOBER 27, 1999

**ENGINEERING STATEMENT
REPLY COMMENTS IN RULEMAKING
TO AMEND
THE FM TABLE OF ALLOTMENTS**

ENGINEERING EXHIBIT EE-2:

MM DOCKET 99-271 - REPLY COMMENTS BY
CENTENNIAL BROADCASTING LICENSE LLC

FM TABLE OF ALLOTMENTS

FM CHANNEL 274C FOR 288C2 - BOULDER CITY, NV
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FM CHANNEL 224C1 FOR 290C1 - KINGMAN, AZ
FM CHANNEL 273A FOR 289A - LUDLOW, CA
FM CHANNEL 240A (ADD) - MOHAVE VALLEY, AZ

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from KDUQ Lic Site - Ludlow, CA.
3. Figure 7, Channel Allocation Study for Ch. 289C.
from KFLG RM Ref. - Dolan Springs, AZ.
4. Figure 8, Allowable Area Map for Ch. 289C.
5. Figure 9, Channel Allocation Study for Ch. 289C.
from KFLG Desired Site - Dolan Springs, AZ.
6. Figure 9-A, Contour Protection Map - Ch. 289C.
from KFLG Desired Site - Dolan Springs, AZ.
7. Figure 10, Channel Allocation Study for Ch. 240A.
from City Ref - Mohave Valley, AZ.

(Figures 1 to 5 are in Centennial's original petition)

ENGINEERING EXHIBIT EE-2:

**MM DOCKET 99-271 - REPLY COMMENTS BY
CENTENNIAL BROADCASTING LICENSE LLC**

FM TABLE OF ALLOTMENTS

FM CHANNEL 274C FOR 288C2 - BOULDER CITY, NV
FM CHANNEL 274C (DELETION) - BULLHEAD CITY, AZ
FM CHANNEL 289C (MOVE) - DOLAN SPRINGS, AZ
FM CHANNEL 272C2 FOR 224C2 - LAKE HAVASU CITY, AZ
FM CHANNEL 224C1 FOR 290C1 - KINGMAN, AZ
FM CHANNEL 273A FOR 289A - LUDLOW, CA
FM CHANNEL 240A (ADD) - MOHAVE VALLEY, AZ

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement has been prepared on behalf of Centennial Broadcasting License LLC, which presently operates FM Station KSTJ on Ch. 288C2 at Boulder City, Nevada. Centennial is also the proponent of MM Docket 99-271 which proposes that the FM Table of Allotments be amended to substitute Ch. 274C for 288C2 at Boulder City, NV, and that the license of KSTJ be modified to specify that channel. The upgrade requested by Centennial involves several additional mutually exclusive channel swaps. The proposed upgrade relies on multiple channel changes.

This engineering exhibit supports reply comments by Centennial which specifically address:

(a) the "Comments on Notice of Proposed Rulemaking and Opposition to Order to Show Cause" filed by Tele-Media Company of Southern California, L.L.C., licensee of Radio Station KDUQ Ch. 289A at Ludlow, CA. The NPRM proposed to substitute Ch. 273A for 289A at Ludlow.

(b) the "Counterproposal" filed by Mag Mile Media, L.L.C., licensee of Radio Station KFLG Ch. 274C at Bullhead City, AZ. The NPRM proposed to substitute Ch. 289C for 274C at Bullhead City.

II. ENGINEERING DISCUSSION:

A. Comments & Opposition by KDUQ:

KDUQ asserts that its existing operation on Ch. 289A receives less "real world" interference than will the operation on Ch. 273A as proposed in the NPRM. Essentially, KDUQ is hoping to retain excess protection it now enjoys beyond its 60 dBu F(50,50) protected contour.

Figure 6 attached hereto is a channel allocation study which indicates that KDUQ's use of Ch. 273A at its existing licensed site is properly spaced to all other stations except the existing operation of KFLG on Ch. 274C at Bullhead City, AZ. However, the NPRM also proposed to substitute Ch. 289C for 274C at Bullhead, thus eliminating this short spacing.

The FCC rules already specifically address the interference concerns expressed by KDUQ. Section 73.209 states:

"(a) Permittees and licensees of FM broadcast stations are not protected from any interference which may be caused by the grant of a new station, or of authority to modify the facilities of an existing station, in accordance with the provisions of this subpart. ..."

"(b) The nature and extent of the protection from interference afforded FM broadcast stations operating on Channels 221-300 is limited to that which results when assignments are made in accordance with the rules in this subpart."

Since Ch. 273A from KDUQ's licensed site will exceed the required separation to all required stations as specified in the rules by at least 19 km (11.8 miles) KDUQ is fully protected from interference as specified by Section 73.209.

B. Counterproposal by KFLG:

The Counterproposal submitted by Mag Mile requests that KFLG remain on Ch. 274C and that its city of license be changed to Dolan Springs, AZ. In addition, Mag Mile requests that a new allotment be made on Ch. 272A to Mohave Valley, AZ.

The NPRM proposed that KFLG operate on Ch. 289C at Bullhead City. In light of Mag Mile's counterproposal Centennial herein proposes to use Ch. 289C at Dolan Springs. Mag Mile has consented to Centennial's new proposal. Figure 7 is a channel allocation study on Ch. 289C from an allotment reference point (35-50-00 / 114-19-00) which is located 25.8 km (16.0 miles) north-northwest of Dolan Springs, AZ. Because of its high ground elevation, Mag Mile requests that this reference point be used to protect the Ch. 289C allotment. KFLG proposes to construct a maximum Class C facility near this reference point. Given that a maximum Class C facility will place a 70 dBu contour over 50 km in the direction of Dolan Springs, city grade service will be easily provided. The short spacings noted on the channel study for Ch. 289C are resolved as follows:

KSTJ to move to 274C	per MM Doc 99-271
KVBC RM to add 289C2	Denied by MM Doc 93-279
KDUQ to move to 273A	per MM Doc 99-271
KRCY to move to 224C1	per MM Doc 99-271

It should be noted that it is no longer necessary for KZUL to dismiss its one-step application (980213IB) to permit use of Ch. 289C by KFLG.

Figure 8 is a map which illustrates the allowable area for Ch. 289C. This map has omitted the changes proposed by MM Docket 99-271 for purposes of clarity.

KFLG's Counterproposal seeking to remain on Ch. 274C supplied its own reference point, which were the coordinates set forth in a 301 application Mag Mile filed on October 8, 1999. KFLG is proposing to co-locate its Dolan Springs facility on a new 610 meter (2000') tower being proposed by KLUK (FM). In the event KFLG is unable to obtain the necessary approvals to construct from the allotment reference point being requested herein (35-50-00 / 114-19-00), the following additional figures demonstrate that the KLUK 2000' tower complies with the contour protection section of the rules available to 301 applications. Figure 9 is a channel allocation study on Ch. 289C from the KLUK site (35-39-03 / 114-18-44). This site has one additional short spacing which has not yet been discussed. An operation on Ch. 289C by KFLG would be short spaced by 10 km to KVRD-FM on 289C3 at Cottonwood, AZ.

Since there is a properly spaced allotment reference site available for KFLG's use of Ch. 289C at Dolan Springs, KFLG has the option of filing to use the KLUK site under Section 73.215 - Contour Protection. Figure 9-A is a "white paper" map which illustrates the protected and interfering contours for the KFLG facility proposed in its October 8, 1999, application (46 kW at 825m HAAT) and for KVRD-FM using

maximum permissible C3 facilities (25 kW at 100m HAAT). As can be seen, no overlap of contours will result. Thus, KFLG can operate on Ch. 289C at the same location, ERP & height as proposed in its recently filed 301 application which specified the KLUK site.

Centennial also has determined that Ch. 240A can be substituted for Ch. 272A at Mohave Valley, AZ. Figure 10 is a channel allocation study on Ch. 288C from the reference coordinates for Mohave Valley (U.S. Census: 34-55-59 / 114-35-17). The reference coordinates exceed the required separation specified in the rules by at least 8 km (5.0 miles) to all required stations.

The KFLG Counterproposal specified a special reference point 12.2 km (7.6 miles) southwest of Mohave Valley in order to permit KFLG to utilize the KLUK tower site. Use of Ch. 240A permits the Mohave Valley city reference point to be used for allotment purposes.

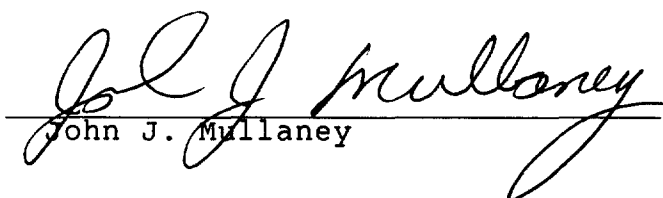
III. SUMMARY:

As shown in this engineering exhibit it is possible to provide an upgrade to KSTJ at Boulder City, NV, while re-allotting KFLG to Dolan Springs, AZ, and creating a new allotment at Mohave Valley, AZ. The fact that KFLG is unable to use the site specified in its October 8, 1999, application for allotment purposes is irrelevant since it only represents a "site preference". In any event, it is still possible for KFLG to utilize its desired site in accordance with Section 73.215 of the rules, while using a reference site for the Dolan Springs allotment that meets all FCC requirements. The interference objection filed by KDUQ is contrary to established interference criteria upon which the entire commercial allotment policies are based.

		**** NPRM ****	****	Revised
		Existing	Proposed	RM
KSTJ	Boulder City	288C2/105.5	274C /102.7	same
KFLG	Bullhead City	274C /102.7	289C /105.7	deleted
KFLG	Dolan Springs			289C /105.7
KJJJ	L.Havasus City	224C2/ 92.7	272C2/102.3	same
KRCY	Kingman	290C1/105.9	224C1/ 92.7	same
KDUQ	Ludlow	289A /105.7	273A /102.5	same
KZUL	L.Havasus City	286C2/105.1	283C2/104.5	n/a
NEW	Mohave Valley			240A / 95.9

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

October 27, 1999.


John J. Mullaney

KFLG-C 289 C FA POLARIZATION ERP (KW) HAAT RCAMSL
 DOLAN SPRINGS AZ US HOR PLN BM TILT (METER) (METER)
 35.5000 114.1900 (D.MMSS) HORIZONTAL 100.000 0.000 600.0
 VERTICAL 100.000 0.000 600.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 600.0 (METERS)

INTERFERING DOMESTIC
 DBU KM
 CO CHANNEL (40.0) 197.8
 1ST ADJACENT (54.0) 136.6
 2ND ADJACENT (80.0) 50.4
 3RD ADJACENT (100.0) 13.7
 PROTECTED (60.0) 91.8
 CITY GRADE (70.0) 67.7

SPECIAL REFERENCE POINT

DOLAN SPRINGS, AZ

AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
			70 DBU	60 DBU
0.0	741.5	2432.8	72.9	97.3
45.0	630.4	2068.2	68.8	93.0
90.0	534.9	1754.9	64.5	88.8
135.0	323.5	1061.3	51.6	74.1
180.0	433.5	1422.1	58.1	82.2
225.0	647.9	2125.7	69.5	93.6
270.0	760.7	2495.6	73.5	98.0
315.0	727.7	2387.4	72.4	96.7
AVERAGE	600.0	1968.5	67.7	91.8

EST SITE ELEVATION : 1463.0 m.; 4800.0 ft.
 EST RAD CENTER AGL : 135.6 m.; 445.0 ft.
 RAD CENTER A.M.S.L.: 1598.7 m.; 5245.0 ft.

THE MEXICAN BORDER IS 347.6 KM ON A BEARING OF 186.2 DEG. TRUE

AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)		HAAT D (M)	I-CON F5010 (KM)	P-CON F5050 (KM)	IR DIST (KM)	IC RSEP (KM)	REZLT IR IC
FROM	TO									HORZ	VERT						
175.5	355.5	KZULFM	APP	BPH980213IB	Lake Hava	AZ A	34.3306	114.1137	3RD 286C2	1.05H	1.05V	814			142.6	105.	
COMMENTOne-Step Application-From Channel 283C2																	
290.3	110.0	KSTJ	LIC	BLH890306KB	Boulder	C NV A	35.5945	114.5151	1ST 288C2	3.7H	3.7V	484D	TO 274C		52.6	188.	S
290.3	110.0	KSTJ	DEL	RM9696	Boulder	C NV A	35.5945	114.5151	1ST 288C2	H	V	0			52.6	188.	-
DOCKET99-271 **																	
300.9	120.3	KVBCFM	LIC	BLH930914KA	Las Vegas	NV A	36.2000	115.2141	3RD 286C2	50.0H	50.0V	11			109.2	105.	C
300.9	120.3	KVBCFM	ADD	RM8385	Las Vegas	NV A	36.2000	115.2141	CO 289C2	H	V		Denied		109.2	249.	S
121.9	303.2	KVRDFM	LIC	BLH971110KI	Cottonwoo	AZ A	34.4111	112.0658	CO 289C3	0.30H	0.30V	779			237.3	237.	C
234.2	53.1	KDUQ	LIC	BLH950718KB	Ludlow	CA A	34.4321	116.1004	CO 289A	6.0H	6.0V	-50	TO 273A		208.7	226.	S
234.2	53.1	KDUQ	DEL	RM9696	Ludlow	CA A	34.4321	116.1004	CO 289A	H	V				208.7	226.	-
DOCKET99-271 **																	
210.9	30.6	KFLGFM	ADD	RM9696	Bullhead	AZ A	35.1456	114.4437	CO 289C	H	V				75.5	290.	.
COMMENTMexican concurrence required																	
182.9	2.9	KRCY	LIC	BLH931108KB	Kingman	AZ A	35.0158	114.2157	1ST 290C1	17.H	17.V	576	TO 224C1		88.9	209.	S
COMMENTNotified to Mexico 971114																	
182.9	2.9	KRCY	DEL	RM9696	Kingman	AZ A	35.0158	114.2157	1ST 290C1	H	V				88.9	209.	-
DOCKET99-271 **																	
359.7	179.7		ADD	RM9549	Logandale	NV A	36.4725	114.1921	2ND 291C1	H	V	0			106.2	105.	C
COMMENTsite 25.9 km (16.1 mi) northeast																	
DOCKET99-118 **																	

CHANNEL ALLOCATION STUDY FOR CH. 289C
 FROM KFLG RM REF. - DOLAN SPRINGS, AZ

MM DOCKET 99-271 - REPLY COMMENTS BY
 CENTENNIAL BROADCASTING LICENSE LLC

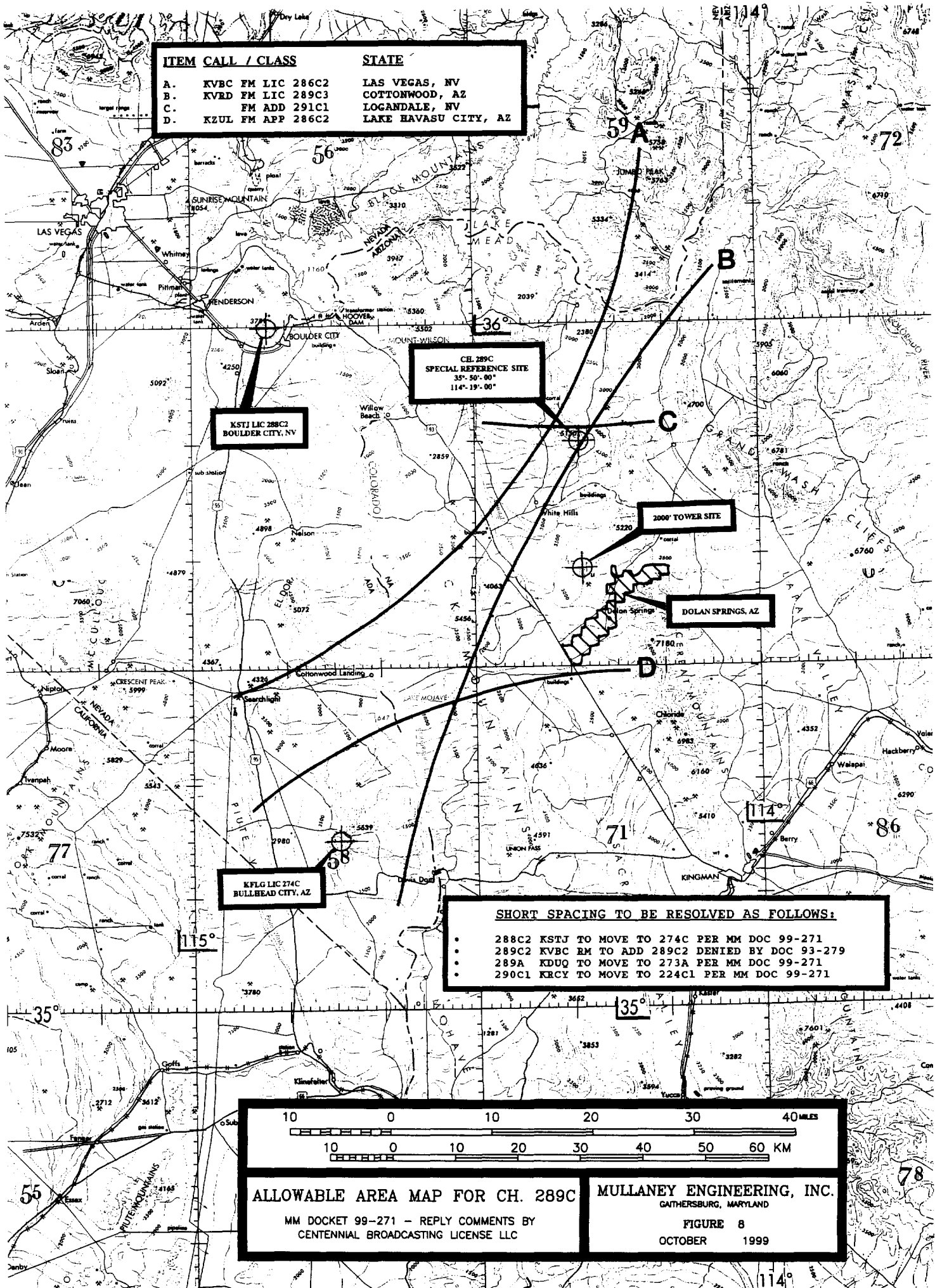
MULLANEY ENGINEERING, INC.
 GAITHERSBURG, MARYLAND

FIGURE 7
 OCTOBER 1999

ITEM CALL / CLASS

STATE

- | | | |
|----|-------------------|----------------------|
| A. | KVBC FM LIC 286C2 | LAS VEGAS, NV |
| B. | KVRD FM LIC 289C3 | COTTONWOOD, AZ |
| C. | FM ADD 291C1 | LOGANDALE, NV |
| D. | KZUL FM APP 286C2 | LAKE HAVASU CITY, AZ |



KFLG-A 289 C FR POLARIZATION ERP (KW) HAAT RCAMSL
 DOLAN SPRINGS (KLUK) AZ US
 35.3903 114.1844 (D.MMSS) HORIZONTAL 46.000 0.000 825.0 1889
 VERTICAL 46.000 0.000 825.0 1889

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 46.000 (KW) 16.6 (DBK) HAAT= 824.7 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL (40.0)	193.8	0.0	713.7	2341.6	63.6 88.1
1ST ADJACENT (54.0)	134.5	45.0	650.6	2134.4	61.4 85.8
2ND ADJACENT (80.0)	48.9	90.0	795.5	2609.8	66.2 90.8
3RD ADJACENT (100.0)	11.8	135.0	545.1	1788.4	57.1 81.4
		180.0	921.0	3021.8	69.4 94.5
		225.0	981.2	3219.0	70.7 95.9
PROTECTED (60.0)	91.7	270.0	1030.1	3379.6	71.7 97.1
		315.0	960.7	3151.7	70.3 95.5
CITY GRADE (70.0)	67.0	AVERAGE	824.7	2705.8	67.0 91.7

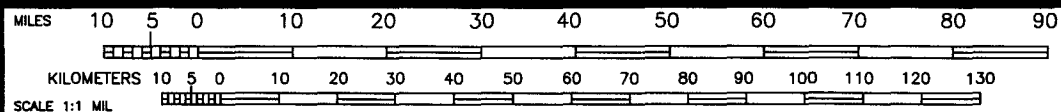
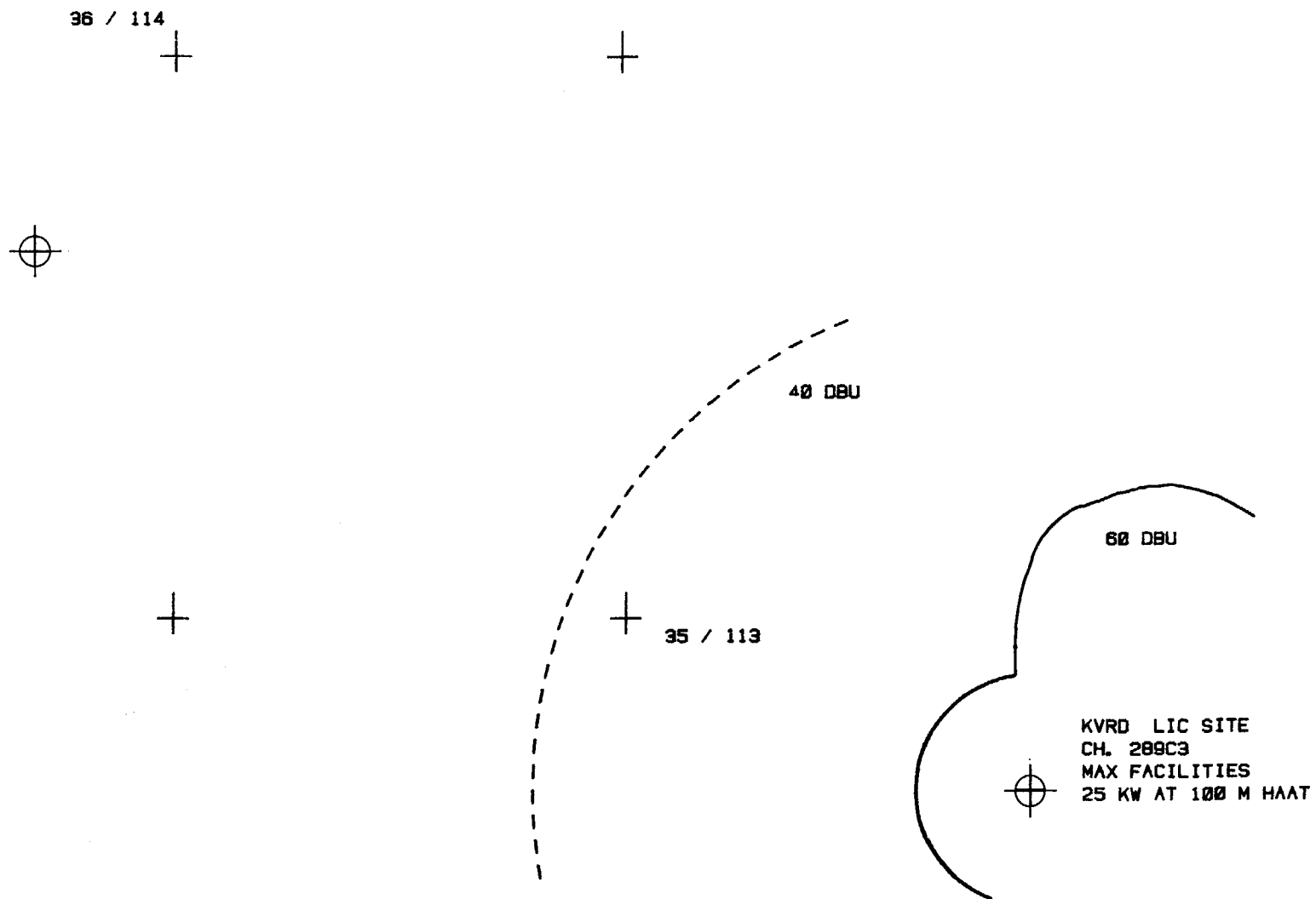
KLUK 2000' TOWER SITE NEAR
 DOLAN SPRINGS, AZ

 THE MEXICAN BORDER IS 327.5 KM ON A BEARING OF 186.7 DEG. TRUE

AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)	HAAT D	IR	IC	RE
											HORZ VERT	(M) A	DIST (KM)	RSEP (KM)	RSEP IF (KM)
174.9	355.0	KZULFM	APP		BPH980213IB	Lake Hava	AZ A	34.3306	114.1137	3RD 286C2	1.05H1.05V	814	122.4	105.	
COMMENTOne-Step Application-From Channel 283C2															
307.8	127.5	KSTJ	LIC		BLH890306KB	Boulder C	NV A	35.5945	114.5151	1ST 288C2	3.7H 3.7V	484D	62.9	188.	S
307.8	127.5	KSTJ	DEL		RM9696	Boulder C	NV A	35.5945	114.5151	1ST 288C2	H V	0	62.9	188.	-
DOCKET99-271 **															
309.1	128.5	KVBCFM	LIC		BLH930914KA	Las Vegas	NV A	36.2000	115.2141	3RD 286C2	50.0H50.0V	11	121.2	105.	
309.1	128.5	KVBCFM	ADD		RM8385	Las Vegas	NV A	36.2000	115.2141	CO 289C2	H V		121.2	249.	S
205.4	24.8	KZAL	LIC		BLH861215KB	Desert Ce	CA A	33.3915	115.2700	1ST 288A	.058H.058V	599	244.8	165.	
117.6	298.9	KVRDFM	LIC		BLH971110KI	Cottonwoo	AZ A	34.4111	112.0658	CO 289C3	0.30H0.30V	779	73.215	226.9	237.
239.1	58.0	KDUQ	LIC		BLH950718KB	Ludlow	CA A	34.4321	116.1004	CO 289A	6.0H 6.0V	-50	197.9	226.	S
239.1	58.0	KDUQ	DEL		RM9696	Ludlow	CA A	34.4321	116.1004	CO 289A	H V		197.9	226.	-
DOCKET99-271 **															
221.3	41.0	KFLGFM	ADD		RM9696	Bullhead	AZ A	35.1456	114.4437	CO 289C	H V		59.4	290.	.
COMMENTMexican concurrence required															
184.1	4.0	KRCY	LIC		BLH931108KB	Kingman	AZ A	35.0158	114.2157	1ST 290C1	17.H 17.V	576	68.7	209.	S
COMMENTNotified to Mexico 971114															
184.1	4.0	KRCY	DEL		RM9696	Kingman	AZ A	35.0158	114.2157	1ST 290C1	H V		68.7	209.	-
DOCKET99-271 **															
359.6	179.6		ADD		RM9549	Logandale	NV A	36.4725	114.1921	2ND 291C1	H V	0	126.4	105.	
COMMENTsite 25.9 km (16.1 mi) northeast															
DOCKET99-118 **															

CHANNEL ALLOCATION STUDY FOR CH. 289C
 FROM KFLG DESIRED SITE - DOLAN SPRINGS, AZ
 MM DOCKET 99-271 - REPLY COMMENTS BY
 CENTENNIAL BROADCASTING LICENSE LLC

MULLANEY ENGINEERING, INC.
 GAITHERSBURG, MARYLAND
 FIGURE 9
 OCTOBER 1999



CONTOUR PROTECTION MAP - CH. 289C
FROM KFLG DESIRED SITE - DOLAN SPRINGS, AZ

MM DOCKET 99-271 - REPLY COMMENTS BY
CENTENNIAL BROADCASTING LICENSE LLC

MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND

FIGURE 9-A
OCTOBER 1999

***** FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 23-OCT-99 11:32:24 *****
 ***** LAST UPDATE: 991023 *****

RM 240 A FR POLARIZATION ERP (KW) HAAT RCAMSL
 MOHAVE VALLEY AZ US HOR PLN BM TILT (METER) (METER)
 34.5559 114.3517 (D.MMSS) HORIZONTAL 6.000 0.000 100.0
 VERTICAL 6.000 0.000 100.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 6.000 (KW) 7.8 (DBK) HAAT= 100.0 (METERS)

INTERFERING DOMESTIC
 DBU KM
 CO CHANNEL (40.0) 86.7
 1ST ADJACENT (54.0) 43.7
 2ND ADJACENT (80.0) 9.1
 3RD ADJACENT (100.0) 2.8
 PROTECTED (60.0) 28.3
 CITY GRADE (70.0) 16.2

CITY REFERENCE POINT FOR
 MOHAVE VALLEY, AZ

AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
			70 DBU	60 DBU
0.0	168.3	552.1	21.2	36.1
45.0	-2.0	-6.7	8.9	15.8
90.0	13.5	44.4	8.9	15.8
135.0	147.1	482.6	19.8	33.8
180.0	183.1	600.9	22.0	37.5
225.0	82.9	271.9	14.5	25.9
270.0	83.8	275.0	14.6	26.0
315.0	123.3	404.4	18.1	31.1
AVERAGE	100.0	328.1	16.2	28.3

EST SITE ELEVATION : 152.4 m.; 500.0 ft.
 EST RAD CENTER AGL : 190.7 m.; 625.7 ft.
 RAD CENTER A.M.S.L.: 343.1 m.; 1125.7 ft.

 THE MEXICAN BORDER IS 246.0 KM ON A BEARING OF 182.9 DEG. TRUE

AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)		HAAT D (M) A	IR DIST (KM)	IC RSEP (KM)	RE IR
FROM	TO									HORZ	VERT				
342.6	162.3	KWNR	LIC	BLH890629KB	Henderson NV A	36.0031	115.0022	2ND 238C	100.B100.B	354		125.2	95.		
96.2	277.6	KZGL	LIC	BLH940505KD	Cottonwoo AZ A	34.4114	112.0700	CO 240C1	9.0H 9.0V	760		227.8	200.		
24.6	205.2	KZHK	LIC	BLH970130KB	St. Georg UT A	36.5049	113.2928	CO 240C	100.H100.V	598		234.3	226.		
COMMENTTransmitter site in Arizona															
342.6	162.3	KKLZ	LIC	BLH841107KY	Las Vegas NV A	36.0029	115.0020	2ND 242C	100.H100.V	358		125.1	95.		

CHANNEL ALLOCATION STUDY FOR CH. 240A
 FROM CITY REF. - MOHAVE VALLEY, AZ

MM DOCKET 99-271 - REPLY COMMENTS BY
 CENTENNIAL BROADCASTING LICENSE LLC

MULLANEY ENGINEERING, INC.
 GAITHERSBURG, MARYLAND

FIGURE 10
 OCTOBER 1999

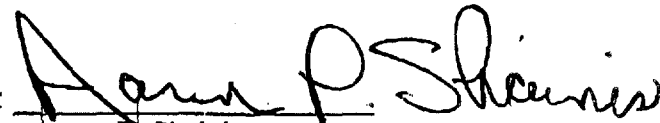
EXHIBIT BCONSENT

On behalf of Mag Mile Media, L.L.C. ("Mag Mile"), this will state that Mag Mile gives its consent to the substitution of Channel 289C for Channel 274C at Dolan Springs, Arizona; and Channel 240A for Channel 272A at Mohave Valley, Arizona. Mag Mile will be filing its own Withdrawal and Request to Substitute Channels today, which will contain a certification that neither Mag Mile nor any of its principals have received or will receive any money or other consideration in exchange for its withdrawal of its expressions of interest in these channels.

MAG MILE MEDIA, L.L.C.

October 27, 1999

By:


Aaron P. Shainis
Member

D.RULEMAKING Consent.doc

CERTIFICATE OF SERVICE

I, Vicki Lynne Lyttle, a secretary at Dow, Lohnes & Albertson, PLLC, do hereby certify that on this 27th day of October, 1999, I had copies of the foregoing "Reply Comments of Centennial Broadcasting License, LLC" delivered via first-class mail, postage pre-paid, to the following:

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Vicki Lynne Lyttle

* Hand delivery.